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Electronically Filed on \_\_\_\_\_

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 and  
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Wells Fargo Bank, N.A.  
 09-72001

UNITED STATES BANKRUPTCY COURT  
 DISTRICT OF NEVADA

In re:

Semisi M. Olive and Heidi A. Olive

Debtor(s).

**Bk Case No.: 09-14286-lbr**  
**Chapter 13**

**RENEWED NOTICE ON MOTION FOR  
 RELIEF FROM AUTOMATIC STAY**

Date: April 28, 2010  
 Time: 10:30 a.m.

ESTIMATED TIME: 5 Minutes

TO THE HONORABLE LINDA B. RIEGLE, THE DEBTORS, DEBTORS' ATTORNEY OF  
 RECORD AND THE CHAPTER 13 TRUSTEE, AND OTHER INTERESTED PARTIES:

1) On or about June 4, 2009, Movant filed a Motion for relief from the  
 automatic stay in regards to secured property generally described as 65 W. Virgin St.,  
 Bunkerville, NV 89010, and legally described as follows:

The East Half(E 1/2) of Lot Three (3) in Block Seven (7) of BUNKERVILLE as shown  
 by map thereof on file in Book 2 of Plats, Page 17 in the office of the County Recorder  
 of Clark County, Nevada.



1 TOGETHER WITH that portion of vacated street as provide for that certain Order of  
2 Vacation recorded June 1, 1990 in Book 900106 as Instrument No. 00511 of Official  
3 Records, Clark County, Nevada, title to which would pass by operation of law with a  
conveyance of said lot.

4 2. On or about June 25, 2009 Debtor's Attorney filed opposition to Movants Motion  
5 for relief from the Automatic Stay.

6 3. On or about November 30, 2010 Counsel for Secured Creditor provided Debtor's  
7 Attorney with an Adequate Protection Order to cure the post petition arrearages. Since  
8 that time Counsel for Secured Creditor has provided Debtor's Attorney with an  
9 "Updated" Adequate Protection Order to cure the post petition arrearages and updated  
10 payment history. Attorney for Secured Creditor has made several follow up requests to  
11 Debtor's Attorney for the signed Adequate Protection. To date Debtor's Attorney has  
12 failed to return the signed Adequate Protection Order.

13  
14 PLEASE TAKE NOTICE that on April 28, 2010 at 10:30 a.m. before United States  
15 Bankruptcy Judge, the Honorable Linda B. Riegle, in Courtroom 1, located at The Foley Federal  
16 Building, 300 Las Vegas Boulevard South, Las Vegas, Nevada. Wells Fargo Bank, N.A., its  
17 assignees and/or successors in interest its successors and assign ("Movant"), has filed its Motion  
18 on June 4, 2009. Secured Creditor is re-noticing all parties, pursuant to 11 U.S.C. §362(d), for  
19 an order terminating the automatic stay, to allow Movant to proceed with its non-bankruptcy  
20 remedies, including, but not limited to foreclosure upon obtaining possession of and selling the  
21 subject real property located at 65 W. Virgin St., , Bunkerville, NV 89010 (the "subject real  
22 property").

23 PLEASE TAKE FURTHER NOTICE that Local Bankruptcy Rule 9014(d)(1) requires that any  
24 opposition to a motion must be filed and service completed upon the Movant not more than fourteen  
25 (14) days after service of the motion. The opposition must set forth all relevant facts and must contain  
26 a legal memorandum. An opposition may be supported by affidavits or declarations that conform to the  
provisions of this rule.



1  
2 If you object to the relief requested, you *must* file a **WRITTEN** response to this pleading with the  
3 court. You *must* also serve your written response on the person who sent you this notice.

4 If you do not file a written response with the court, or if you do not serve your written response on the  
5 person who sent you this notice, then:

- 6 ☐ The court may *refuse to allow you to speak* at the scheduled hearing; and  
7 ☐ The court may *rule against you* without formally calling the matter at the hearing

8 Dated this 22 day of March 2010

9 Submitted by:  
10 WILDE & ASSOCIATES.

11 Michael P. Wilde #10099  
12 GREGORY L. WILDE, ESQ.  
13 Nevada Bar No. 4417  
14 212 South Jones Boulevard  
15 Las Vegas, Nevada 89107  
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**UNITED STATES BANKRUPTCY COURT  
 DISTRICT OF NEVADA**

In Re:	Bk Case No.: 09-14286-lbr
Semisi M. Olive and Heidi A. Olive	Date: April 28, 2010 Time: 10:30 a.m. Chapter 13
Debtors.	

**CERTIFICATE OF SERVICE OF RENEWED NOTICE  
 ON MOTION FOR RELIEF FROM AUTOMATIC STAY**

1. On 3/22/10 I served the following document(s):

**RENEWED NOTICE ON MOTION FOR RELIEF FROM AUTOMATIC STAY**

I served the above-named document(s) by the following means to the persons as listed below:

**X a. ECF System**

David Krieger  
[dkrieger@hainesandkrieger.com](mailto:dkrieger@hainesandkrieger.com)  
 Attorney for Debtors



Kathleen A. Leavitt  
courtsecf3@las13.com  
Trustee

**X b. United States mail, postage fully prepaid:**

David Krieger  
1020 Garces Ave.  
Las Vegas, NV 89101  
Attorney for Debtors

Semisi M. Olive and Heidi A. Olive  
PO Box 7224  
Bunkerville, NV 89007  
Debtors

IRS  
Attention: Managing Agent  
110 City Parkway, MS 5028  
Las Vegas, NV 89106

☐ **c. Personal Service** (List persons and addresses. Attach additional paper if necessary)

I personally delivered the document(s) to the persons at these addresses:

☐ 1. For a party represented by an attorney, delivery was made by handing the document(s) to the attorney's office with a clerk or other person in charge, or if no one is charge by leaving the document(s) in a conspicuous place in the office.

N/A

☐ 2. For a party, delivery was made by handing the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there. N/A

☐ **d. By direct mail**

Based upon the written assignment of the parties to accept service by email or a court order. I caused the document(s) to be sent to the persons at the mail addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.



1  
2 ☐ **e. By fax transmission**

3 Based upon the written assignment of the parties to accept service by fax transmission or  
4 a court order. I faxed the document(s) to the persons at the fax numbers listed below. No error  
5 was reported by the fax machine that I used. A copy of the record of the fax transmission is  
6 attached.

7 ☐ **f. By messenger**

8 I served the document(s) by placing them in an envelope or package addressed to the  
9 persons at the addresses listed below and providing them to a messenger for service.

10 **I declare under penalty of perjury that the foregoing is true and correct.**

11 DATED this 22nd day of March, 2010.

12 By: \_\_\_\_\_  
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